



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

We make Indiana a cleaner, healthier place to live

Frank O'Bannon
Governor

Michael O'Connor
Commissioner

100 North Senate Avenue
P.O. Box 6015
Indianapolis, Indiana 46206-6015
Telephone 317-232-8603
Environmental Helpline 1-800-451-6027

VIA CERTIFIED MAIL P 451 350 751

June 10, 1997

Mr. Rod Muzzarelli, Vice President
Mid-City Plating Company, Inc.
416 South Hackley Street
Muncie, Indiana 47305

Dear Mr. Muzzarelli:

Re: Source Evaluation Report
Mid-City Plating Company, Inc.
Muncie, Indiana
IND 006049456

The Indiana Department of Environmental Management (IDEM) acknowledges receipt of Mid-City Plating Company's (Mid-City's) response to IDEM's September 19, 1996 comments on the August 30, 1996 Source Evaluation Report. The response, dated November 7, 1996, was prepared by Delta Compliance Consultants and submitted by Mr. Thomas Jensen of McHale, Cook & Welch. The IDEM has reviewed the response and found it to be deficient according to the enclosed comments.

As discussed during Ms. Becky Eifert's and Mr. Lloyd Wilkinson's visit to the site on June 4, 1997, please provide a revised Source Evaluation Report in response to the enclosed comments to the IDEM within forty-five (45) days of your receipt of this correspondence. If you have any questions or concerns, or would like to schedule a meeting to discuss the comments and/or future activities at the facility, please contact Ms. Becky Eifert of my office at 317/232-3404.

Sincerely,

Victor P. Windle, Chief
Hazardous Waste Permit Section
Hazardous Waste Facilities Branch
Solid and Hazardous Waste Management

RME/cs
Enclosure

cc: Mr. Thomas H. Martin, DELTA Compliance Consultants
Mr. Thomas A. Jensen, McHale, Cook, & Welch, p.c.
Mr. Lloyd Wilkinson, IDEM
Ms. Pam O'Rourke, OE, IDEM
File: IC1c, Delaware County ✓

23a

Indiana Department of Environmental Management
Office of Solid and Hazardous Waste
Review of the November 7, 1996 Response to IDEM's September 19, 1996 Comments on the
August 30, 1996 Source Evaluation Report
Mid City Plating Company, Inc.
Muncie, Delaware County, Indiana
EPA ID No. IND006049456

Mid-City's response to IDEM's comments on the Source Evaluation Report was reviewed and found to be deficient pursuant to the following comments:

1. The IDEM is not convinced that the soil cyanide concentrations are not attributed to the unit. Naturally occurring iron in soils probably would perform cation exchange with the zinc and form iron complexes with the cyanide. Provide literature and laboratory analytical data of the site soils that support the conclusion that the waste is not the source of contamination. Page 2 of the Source Evaluation Report stated, "Total cyanide is not amenable to chlorination because the cyanide is complexed with iron to form a very stable complex. However, cyanide which is complexed with zinc is amenable to treatment by alkaline chlorination. Since the cyanide in the soil samples is complexed with iron and not zinc, the source of the contamination would not be sludges from the zinc plating process (F008)." No documentation or analytical results were provided to support this conclusion.
2. Identify the alternate source of cyanide and provide soil analytical results near the alternate source at the facility to indicate that the plating storage area is not the source. Note that the background borings on the north east side of the building have low levels of cyanide (<0.4 ppm).
3. Corrective Action levels are not applicable to this project.
4. Tabulate the matrix spike as below so that the concentration of spiked matrix is easily determined and the percent recovery easily calculated. The concentrations in the text were of the undiluted samples and spikes.

Matrix Spike (ppm)				
Sample ID	Sample Conc.	Spiked Amount	Spike Result	% Recovery
SB812	<0.005	0.05	0.048	96
SO224	0.0286	0.05	0.071	85
SO306	0.0407	0.05	0.095	109
SO324	0.0131	0.05	0.089	152